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Public Comment on Final Report
Interagency Ocean Policy Group
White House Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

As groups committed to halting the steady decline in the health of our nation's coasts and oceans, we appreciate the opportunity to comment on the U.S. Commission on Ocean Policy's Final Report, "An Ocean Blueprint for the 21st Century." The release of the report offers an historic opportunity for the Administration to help bring about significant, lasting, and much needed reforms in the nation's ocean and coastal management regime. The report makes 212 specific recommendations, many of which directly relate to improving coastal management and coastal water quality, and, if put in place, would mean positive changes for our nation's coastal areas and waters. We urge you to act quickly and decisively in putting positive changes in place. As groups who have been working on coastal protection issues for decades, we recognize how critical it is that we seize this opportunity to prevent the collapse of our ocean ecosystem. Inaction has led to the situation today – we urge you to take bold, courageous steps to preserve our resources for ourselves and our children.

Several groups, including Coast Alliance on behalf of the greater coastal conservation community, submitted comments following the release of the Preliminary Report. We reiterate today how imperative it is that you heed the findings of the report – summarily that our ocean and coastal resources are in peril – and applaud many of the recommendations made in the Preliminary Report and carried over to the final report. The Final Report makes a strong case for a new governance framework, for increased investment in marine science, and for a new stewardship ethic for our oceans and coasts, within the context of an ecosystem-based management approach, all of which we strongly support. We also appreciate the strengthening changes to the Final Report to Chapter 10 with regard to coastal hazards. We heartily agree with the Commission's recommendations for reforming the National Flood Insurance Program to reflect the true costs of hazards and to discourage building in risky, fragile environments like our nation's beaches. We also understand that the massive scope of the Commission's work did not allow the level of detail warranted on every issue facing our marine resources.

However, we trust that as this process moves forward, the IOPG will take these considerations into account when formulating the Administration's response to the report.

When commenting on the Preliminary Report, we applauded several of the recommendations made in that document, and suggested where improvements could be made. For instance, we urged the Commission to recommend specific improvements to the Coastal Zone Management Act relating to growth management mechanisms, such as Low Impact Development, proper site design, growth boundaries, targeting growth around existing transportation corridors, public transport, or integrating Phase II stormwater strategies to prevent sprawl and pollution. We also urged the Commission to make specific recommendations for improving the Coastal Barrier Resources System, including expansion of the System to include threatened and high-hazard lands on the Pacific Coast. As you proceed, we urge you to incorporate these suggestions into any objectives for national coastal policy.

We would like to point out that in Chapter 9, the Preliminary Report made a strong recommendation that amendments to the Coastal Zone Management Act include additional funding to achieve the goals of the CZMA. As evidenced by the rapid, uncontrolled growth in our coastal areas, the CZMA must be improved and updated to help coastal communities retain their character and protect their fragile resources. We agree with the Commission that incentives and disincentives, along with enforceable measures, must be part of the mixture of tools to address the problems facing our coasts. That being said, the law and its consistency regulations have proven successful given the limitations of its current framework in helping create coastal management policy that is both protective of our coastal resources and addresses the competing demands facing our coasts. The program works, but has been woefully underfunded over the years. One example is the Coastal Nonpoint Pollution Program, which was paralyzed by negligible funding for years, and therefore has been unable to achieve its original goals. Supporting increased funding is the most crucial first step the administration can take toward improving the CZMA and coastal management policy. This is not to say that we endorse "blank checks" to coastal states. As mentioned above, we believe strongly that states must meet national standards for issues like growth management, nonpoint pollution, coastal habitat protection and taking measures to prevent flood and hazard management as conditions of federal coastal money. As the Commission report mentions, federal efforts to protect our oceans must be an integrated policy. As you are aware, the federal government wields enormous power simply by virtue of its purse strings. By spending federal money wisely to support beneficial coastal programs and supporting states that take measures to protect their coastal resources and then also reducing federal subsidies for actions that harm our coasts, we have the potential to make rapid progress to reverse some of the damage being done to our coastal and ocean ecosystems.

We are deeply troubled by the statement added to the Final Report in Chapter 9, under "Implications of Growth." The Commission implies that protections for coastal habitats have acted as a significant barrier to public beach access and coastal waters. In fact, laws protecting coastal habitats do not substantially interfere with the public's access to beaches, and rather, enhance their enjoyment of the nation's beaches. Coast Alliance has

been, and always will be an advocate for public access to America's beaches. Getting closer to nature is one of the best tools we have to educate our children about the wonders of the coastal world. The additional statement we refer to above is simply unsubstantiated and we urge the Administration to disregard this assertion in formulating your response.

We are most concerned with some weakening language added in Chapter 11, and are concerned the Commission may be downplaying one of the most important tools we have at our disposal for protecting coastal resources: restoration. Fortunately, the report retains the section on coastal habitat restoration, but several times within the chapter refers to restoration's "scientific uncertainty" and extreme expense. Indeed, there are instances where restoration projects have not met the goals they were designed to after considerable expense. We believe that these initial efforts are not failures, but rather an investment in our education of the science of restoration. With every new project, new lessons are learned. America did not abandon its efforts to go into space after repeated missteps and incredible expense. We must be humble enough to admit that we owe it to our children to restore degraded habitats because it is our actions which led us to allow these areas to become so degraded in the first place.

In addition, the science of coastal restoration has grown exponentially over the past several years, and there are several federal programs currently in place that have proven extremely successful. For instance, the Community-Based Restoration Grants Program in the National Oceanic and Atmospheric Administration has funded over 700 projects in 27 states, and is extremely cost-effective, with nonfederal partners generally matching federal dollars 1 to 1, and pulling in investments through state and local participation *up to ten times* the federal investment. As a result of successful restoration efforts, a formerly polluted waterway in Jacksonville, North Carolina has restored water quality and engaged a community, native oysters are beginning to recolonize in Puget Sound, and eroding beachfront areas are being supported by "living shorelines" also in North Carolina, and Atlantic salmon and alewives are rebounding on the Kennebec River in Maine where the Edwards dam has been taken out. There are countless other examples of communities around the country that have engaged in restoration efforts with similar degrees of success. We hope the Administration will keep in mind the extreme importance of coastal restoration programs and include restoration in a comprehensive ocean and coastal policy.

We would also urge that the Administration response regarding coastal habitat conservation include a particular emphasis on land acquisition. The report makes specific mention of this tool several times, and refers to the funding of the Coastal and Estuarine Land Conservation Program (which funds coastal land acquisition), but does not specifically address acquisition in its recommendation. As several coastal governors have noted, acquisition of coastal habitats is crucial and is one of the key actions needed from the federal government.

It is clear that the existing governance structure for coastal management is insufficient to protect fragile coastal ecosystems. Combined with the Pew Oceans Commission report released last year, the U.S. Commission on Ocean Policy Report has created a

groundswell of support for ocean and coastal management reform. The Administration must take advantage of this momentum and take the lead in creating a new policy that protects sensitive coastal ecosystems, improves upon current coastal management programs, funds critical restoration and land acquisition projects, improves coordination among the myriad agencies with jurisdiction over coastal areas and redirects federal money spent on subsidies. After the hurricane season we have experienced, the time is ripe for the Administration to lead efforts as recommended by the Commissioners to withhold federal funds for projects like armoring and sea walls, jetties and groins, as well as flood insurance and disaster relief, and instead spend them on beneficial programs. To take advantage of this opportunity requires an entirely new way of looking at our oceans and coasts. But more importantly, it takes leadership. Governor Schwarzenegger has already committed himself to making the oceans an important part of his legacy. The Commission has laid out a strong set of recommendations on which the Administration can base its proposals. We urge you to move forward based on their findings; and we are happy to work with you to create the next generation of coastal policy, which will give us sustainable, vibrant coastal communities and healthy oceans.

Sincerely,

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